

Exhibit B

CFHOJ

**CURNEY, FARMER, HOUSE,
OSUNA & JACKSON, P.C.**

JOHN CURNEY-1960-2015
djackson@cfholaw.com

J. Dean Jackson, Shareholder

May 21, 2020

Paul Stern
Torts Branch, Civil Division
U.S. Department of Justice

Via Email: Paul.david.stern@usdoj.gov

RE: Cause No. 5:18-cv-00555-XR; *Holcombe, et al. v. United States of America*; In the United States District Court for the Western District of Texas – San Antonio Division
CFHOJ File No.: 748.2036-wdf

Dear Paul:

Yesterday I filed my responses and objections to the U.S. Governments subpoena of documents for my clients Michael and Rebecca Kelley. These responses and objections are to preserve the legal interests of my clients in the event that any documentation is located that may be responsive to your requests. Your requests were voluminous and my clients are going through any remaining materials that they may have that would contain documents responsive to your requests.

However, please understand that my clients have informed me that they have given everything they had to either the Federal Bureau of Investigations (“FBI”), The Texas Rangers (“Rangers”) or the United States Air Force (“USAF”). However, they will continue to look and if any other documents are located they will be either voluntarily produced or I will notify you of their existence so that a hearing may be had if the government deems necessary.

If you have any questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

**CURNEY, FARMER, HOUSE,
OSUNA & JACKSON, P.C.**


J. Dean Jackson

JDJ/lek

cc: Gerald Bourque via email: gerald@geraldebouque.com
Jamal Alsaffar via email: jalsaffar@nationaltriallaw.com

OVER
25
YEARS OF
EXCELLENCE

411 Heimer Road
San Antonio, TX 78232

P: 210-377-1990
F: 210-377-1065

www.cfholaw.com